

Fill in this information to identify the case:

Debtor 1 Andres C. Pinedo

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania

Case number 5:19-bk-02045-MJC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2007-GEL2

Court claim no. (if known) 6

Last 4 digits of any number you use to identify the debtor's account: XXXXXX6678

Property address: 137 Maria Lane
Number Street

Dingmans Ferry PA 18328
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.
- The next postpetition payment from the debtor(s) is due on : 02 / 01 / 2025
MM / DD / YYYY
- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1

Andres C Pinedo

First Name

Middle Name

Last Name

Case number (if known) 5:19-bk-02045-MJC**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs the creditor must attach an itemized payment history disclosing the following amount from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applied.

/s/ Roger Fay, Esq., ID No. 315987
Signature

Date November 14, 2024

Print Roger Fay, Esquire
First Name Middle Name Last Name

Title Attorney for Creditor

Company Albertelli Law

If different from the notice address listed on the proof of claim to which this response applies:

Address 14000 Commerce Parkway, Suite H
Number Street

Mount Laurel NJ 08054
City State ZIP Code

Contact phone: (856) 724-1888

Email: rfay@alaw.net

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Andres C Pinedo,
Debtor,

Bankruptcy No. 5:19-bk-02045-MJC
Chapter 13

U.S. Bank National Association, as Trustee for
Structured Asset Securities Corporation
Mortgage Pass-Through Certificates, Series
2007-GEL2,

Secured Creditor,

Andres C Pinedo,
Debtor / Respondent,

and
Jack N Zaharopoulos,
Trustee / Respondent.

CERTIFICATION OF SERVICE

Roger Fay, Esquire counsel for U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2007-GEL2, hereby certifies that a copy of the RESPONSE TO NOTICE OF FINAL CURE PAYMENT was served upon the following persons via electronic transmission or by regular first-class mail, postage prepaid on November 14, 2024, addressed as follows:

Jack N Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 <i>via electronic transmission and regular mail</i>	Mark E. Moulton Moulton and Moulton PC 693 State Route 739, Suite #1 Lords Valley, PA 18428 <i>via electronic transmission and regular mail</i>
Andres C Pinedo 137 Maria Lane Dingmans Ferry, PA 18328 <i>via regular mail</i>	

ALBERTELLI LAW

DATED: November 14, 2024

By: /s/ Roger Fay, Esq., ID No. 315987
14000 Commerce Parkway, Suite H
Mount Laurel, NJ 08054
rfay@alaw.net
(856) 724-1888
Attorneys for Secured Creditor